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Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Docket 17-258, Promoting Investment in the 3550-3700 MHz Band

CTIconnect, LLC is a distributor of fixed wireless, telecommunications, network infrastructure and computer systems for Internet Service Providers (ISP's), utilities, government, enterprise, transportation and industrial networks in North America. Servicing over 1,100 Rural Providers and Telcos, the equipment and services our company provides help keep over 500,000 rural customers connected to high speed internet using Fixed Wireless technology.

As a trusted partner to many rural broadband providers best positioned to take advantage of the CBRs band, we believe that changing the PAL auction areas to be based on PEA's will be a catastrophic mistake. Increasing the size of the PAL's will simply create unsurmountable hurdles for small, rural providers – they very ones these rules were originally intended to support – out of contention for coveted spectrum to provide world class services. Operators simply will not be able to afford licenses based on larger geographic areas, or will force operators to buy licenses in areas they never plan to expand into – preventing other operators from servicing parts of that PAL. Larger PAL's will also tie up working capital of these rural operators that could be better served in actual infrastructure investment to deliver Broadband to residents of the area.

Additionally, by extending the length of the terms of the PAL license bring additional negative impact to rural American's. First, as demonstrated in the Commission's proceedings in 28GHz and 39GHz, when long licenses are issued investment typically is slow – just enough to meet FCC guidelines to maintain the spectrum. Second, a longer-term license prevents a successful service provider from expanding their coverage area to serve more American's, as they must wait for the initial term to expire. Both factors are critical to realize actual infrastructure investment today.

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As a distributor for many of the most popular Fixed Wireless technologies used by service providers in the United States, we have witnessed a significant decline in investment in Part 90 3650-3700 MHz equipment due to the perceived uncertainty in how the rules will be defined. We have a symbiotic relationship with 1,000s of service providers across rural America – our success is defined by our customers capability to provide next-generation Broadband services to rural American's. Their success is our success as a small business – and has been the engine of growth that has advanced communications technologies in many sectors including such as Utilities and Public Safety.

CTIconnect supports the Wireless Internet Service Providers Association (WISPA) position regarding Docket 17-258. We oppose the increase in PAL license sizes or extending the term length as both changes will dramatically decrease rural Broadband infrastructure investment.

Respectfully Submitted,

Daniel White